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D. Max Gardner, Esq. (CSB No. 132489)

Attorney for Jeffrey M. Vetter,
Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA**

In re:

Arturo Camacho and Beatrice Camacho

Debtors

Case No. 10-14278

Chapter 7

DC: JMV-2

DATE: December 14, 2010

TIME: 1:00 p.m.

DIV: 1300 18th St., Suite A,
Bakersfield, CA

JUDGE: WHITNEY RIMEL

**MOTION FOR ORDER AUTHORIZING SALE
OF REAL PROPERTY**

TO THE HONORABLE WHITNEY RIMEL, UNITED STATES BANKRUPTCY JUDGE:

Chapter 7 Trustee, Jeffrey M. Vetter, respectfully represent as follows:

1. Jeffrey M. Vetter is the duly qualified acting Trustee in the Chapter 7 case filed by Arturo and Beatrice Camacho ("Debtors"). Debtors filed for relief under Chapter 7 of the Bankruptcy Code on April 21, 2010.

2. The assets of this estate include underdeveloped real property located at 7456 Lionel Street, Paramount, California (hereinafter "the Lionel Street property"). Jorge Ruelas, the Buyer, has agreed to purchase the Lionel Street property for the sum of \$230,000. Attached hereto as Exhibit A and incorporated herein by reference is a true and correct copy of Counteroffer No. One accepted by the Buyer. The estate's share of the property is approximately \$62,000 of the purchase price.



1 3. Pursuant to the terms of the proposed sale, the estate will pay up to \$1,500.00
2 towards a Wood Destroying Pest Inspection Par 2C (1) from the proceeds of the sale. In addition
3 thereto, a commission not exceeding six percent (6%) will be paid to Duke & Associates, real
4 estate broker for the estate, pursuant to the Order Authorizing Trustee to Hire Real Estate
5 Broker.

6 4. After marketing the property through a professional real estate broker, the sum of
7 \$230,000 represents the highest offer received for the Lionel Street property. Trustee believes
8 that the sum of \$230,000 is the fair market value of said property and respectfully requests that
9 the court approve the sale of the Lionel Street Property to Mr. Ruelas for the sum of \$230,000,
10 upon the terms and conditions set forth in Exhibit A.

11 5. This motion is brought consistent with the requirements of 11 U.S.C. §363.

12 WHEREFORE, Chapter 7 Trustee prays that the Court approve the sale of the Lionel
13 Street property under the terms and conditions herein and for such other and further relief
14 appropriate under the circumstances of this case.

15 Dated: NOV. 17, 2010

LAW OFFICES OF YOUNG WOOLDRIDGE, LLP

16
17 By 

D. Max Gardner,

Attorney for Jeffrey M. Vetter, Chapter 7 Trustee